

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
KENNETH CLARENCE BLACKWELL,	:	
SR aka Kenneth Clearance Blackwell, Sr	:	CASE NO. 1:18-bk-01119
CHERI KAY WILLIAMS BLACKWELL	:	
Debtors	:	
	:	
KENNETH CLARENCE BLACKWELL,	:	
SR aka Kenneth Clearance Blackwell, Sr	:	
CHERI KAY WILLIAMS BLACKWELL	:	
Movants	:	
	:	
v.	:	
	:	
DAUPHIN COUNTY TAX CLAIM	:	
BUREAU,	:	
Respondent	:	

**MOTION TO DETERMINE SECURED STATUS WITH CONCURRENCE OF
RESPONDENT**

COME NOW the Debtors, by and through through Dorothy L. Mott, Esquire, and respectfully move the Court pursuant to Section 506 of of the Code to Determine Secured Status, respectfully stating in support thereof:

1. The Debtors filed the above-captioned bankruptcy on 3/21/2018.
2. The Debtors' plan provides for cramdown payments to Dauphin County Tax Claim Bureau in the amount of \$500.00 each as the amount of the secured claim in two properties located at 2220 N 6th Street, Harrisburg, PA and 2222 N 6th Street, Harrisburg, PA.
3. The Debtors seek a determination that the secured claim of the Respondent is \$500.00 each.
4. Debtors' counsel has contacted F. R. Martsolf, Esquire, Solicitor for Dauphin County Tax Claim Bureau and he concurs in this motion.

WHEREFORE, the Debtors respectfully request that this Court enter an order determining that the amount of the Respondent's secured claim is \$500 in each of the two properties referred to above.

Respectfully submitted,

/s/ Dorothy L. Mott
Dorothy L. Mott, Esquire
Attorney ID# 43568
Dorothy L Mott, Law Office, LLC
125 State Street
Harrisburg, PA 17101
(717) 232-6650
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CHERI KAY WILLIAMS	:
BLACKWELL	:
Movants	:
	:
v.	:
	:
DAUPHIN COUNTY TAX CLAIM,	:
Respondent/Claimant	:

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on July 17, 2018, I served a copy of the foregoing document(s) electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows on the following parties:

Name and Address	Mode of Service
CHARLES J DEHART, III, ESQUIRE	Electronically
ANNE K FIORENZA ESQUIRE Assistant US Trustee	Electronically
DAUPHIN COUNTY TAX CLAIM BUREAU fmartsolf@ssbc-law.com nspincken@dauphinc.org	Electronically

I certify under penalty of perjury that the foregoing is true and correct.

Date: 07/17/2018

/s/ Dorothy L. Mott
Dorothy L. Mott, Esquire
Attorney ID# 43568
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	:	
v.	:	
	:	
DAUPHIN COUNTY TAX CLAIM,	:	
Respondent/Claimant	:	
	:	
	:	

ORDER

UPON CONSIDERATION of the Motion to Determine Secured Status, it is hereby
ORDERED AND DECREED that the Respondent's secured claim for the properties
located at 2220 N 6th Street, Harrisburg, PA and 2222 N 6th Street, Harrisburg, PA is \$500.00
for each property.